

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**Hearing Date: March 15, 2023  
Hearing Time: 2:00 PM**

In re:

VOYAGER DIGITAL HOLDINGS, INC., *et*  
*al.*,  
Debtors.

Chapter 11

Case No. 22-10943 (MEW)  
(Jointly Administered)

**NOTICE OF EXPEDITED MOTION FOR STAY PENDING APPEAL**

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PLEASE TAKE NOTICE that, upon the accompanying Memorandum in Support of the United States of America and United States Trustee's Expedited Motion for Stay of Confirmation Order Pending Appeal Pursuant to Federal Rule of Bankruptcy Procedure 8007, the United States of America, by its attorney Damian Williams, United States Attorney for the Southern District of New York; and Justice Department official William K. Harrington, the United States Trustee for Region 2 (together, the "**Government**"), submit this Expedited Motion for Stay Pending Appeal (the "**Motion**") pursuant to Federal Rule of Bankruptcy Procedure 8007. This Motion seeks (1) a partial stay pending appeal<sup>1</sup> of the exculpation provision of the March 8, 2023, Confirmation Order confirming the Third Amended Joint Chapter 11 Plan of Voyager Digital Holdings, Inc., *et al.* [Dkt. No 1159], or, if necessary, a stay of the entire Confirmation Order, and (2) in the alternative, if the Court denies the stay pending appeal, a two-week stay for the Government to pursue a stay in the District Court. Additionally, the Government requests an interim stay until the Court decides and determines this Motion, because the current stay expires on Wednesday, March 15, 2023, at 5:00pm.<sup>2</sup> Thus, absent an interim stay, the challenged exculpation provision will become effective before the Court has had an opportunity to rule on the Motion.

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<sup>1</sup> See Notice of Appeal of United States and U.S. Trustee Region 2 of Order Confirming Debtors' Chapter 11 Plan [Dkt. No. 1165].

<sup>2</sup> See Order Extending the Stay of the Confirmation Order [Dkt. No. 1169].

Dated: March 14, 2023  
New York, New York

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